

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	<u>ORDER</u>
	:	
-v.-	:	21 Cr. 446 (VSB)
	:	
ANDREW FRANZONE,	:	
	:	
Defendant.	:	
	X	

Upon the application of the United States, by the Acting United States Attorney for the Southern District of New York, Matthew Podolsky, by Assistant United States Attorney Sarah Mortazavi, dated April 2, 2025;

WHEREAS on or about March 25, 2025, this Court issued an order authorizing the United States Internal Revenue Service (“IRS”) to disclose taxpayer return information purportedly associated with the scheme charged in Counts One and Two of the Indictment (the “Tax Order”). On April 2, 2025, the Government received a production of documents from IRS in response to the Tax Order (the “Tax Documents”);


WHEREAS trial in the above-captioned matter is currently scheduled to begin on April 14, 2025;

IT IS HEREBY ORDERED that, giving due consideration to congressional policy favoring the confidentiality of returns and return information as set forth in Title 26, United States Code, the Tax Documents are required to be produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure; and

IT IS HEREBY FURTHER ORDERED that the Tax Documents are probative of a matter in issue relevant in establishing the guilt of the defendant, *i.e.*, at the forthcoming trial in the above-captioned matter.

SO ORDERED.

Dated: New York, New York
April 4, 2025


HONORABLE VERNON S. BRODERICK
UNITED STATES DISTRICT JUDGE